

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JANE DOE	§
Plaintiff	§
	§
VS.	§ CIVIL ACTION NO. 7:19-CV-00309
	§ (JURY REQUESTED)
	§
EDINBURG CONSOLIDATED	§
INDEPENDENT SCHOOL DISTRICT	§
Defendant	§

**DEFENDANT'S EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT
SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES**

To: Plaintiff by and through her attorney of record:

Anthony G. Buzbee
Cornelia Brandfield-Harvey
The Buzbee Law Firm
600 Travis, Suite 7300
Houston, Texas 77002

COMES NOW, EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT, Defendant in the above-styled and numbered cause and pursuant to Rule 197 of the Texas Rules of Civil Procedure attached hereto makes the following supplemental responses and objections to Plaintiff's First Set of Interrogatories. Defendant reserves the right to supplement, modify or amend the information provided below.

Signed on **February 25, 2020**.

Respectfully submitted,

ESPARZA & GARZA, L.L.P.

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By: /s/ Eduardo G Garza

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on **February 25, 2020**, a true and correct copy of the foregoing **Defendant's Edinburg Consolidated Independent School District Responses to Plaintiff's First Set of Interrogatories** has been served on all attorneys of record as noted below:

Via E-Mail

Anthony G. Buzbee
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Via E-mail

Aaron I. Vela
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By: /s/ Eduardo G Garza

Eduardo G Garza

INTERROGATORIES

2. Identify any and all your policies that protect your students from the inappropriate contact or sexual contact of your employee(s), include the implementation date of each policy and the name of the person(s) responsible for implementing the policy.

ANSWER:

All employees are trained annually on Title IX, child abuse and sexual harassment including appropriate vs. inappropriate contact with students. As further response to this interrogatory, information responsive to this interrogatory is contained in Exhibit M to Defendant's responses to requests for production which includes the Employee Handbook that addresses standards, policies and procedures applicable to all employees including topics of employee conduct and welfare, standards of conduct, discrimination harassment and retaliation, harassment of students, reporting suspected child abuse, sexual abuse and maltreatment of children, and reporting crimes. In addition, Exhibit M further includes the following policies: FFG (Student Welfare Child Abuse and Neglect), FFH (Student Welfare Freedom from Discrimination, Harassment and Retaliation), and DH (Employee Standards of Conduct). Issuance dates are listed at the bottom of each policy. All policies of the Edinburg CISD are found online at <https://pol.tasb.org/Home/Index/635>. The superintendent of the District is responsible for implementing all policies established by the Board of Trustees.

8. Identify the person(s) responsible for implementing a policy to prevent the sexual abuse of Defendant's students after March 2013.

ANSWER:

All staff and employees of Defendant are responsible for making efforts to prevent the sexual abuse of students. The superintendent of the District is responsible for implementing all policies established by the Board of Trustees.